

MICHAEL J. GARCIA  
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Southern District of New York  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
:  
UNITED STATES OF AMERICA :  
:  
-v.- : NOTICE OF MOTION  
:  
:  
\$9,781.41 FORMERLY ON DEPOSIT AT MAN : 07 Civ. 6224 (SHS)  
FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 5358, HELD IN THE NAME OF NARESH :  
KUMAR JAIN; :  
:  
\$684,942.00 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 4277, HELD IN THE NAME OF NARESH :  
KUMAR JAIN; :  
:  
\$768,870.32 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 8565, HELD IN THE NAME OF NARESH :  
KUMAR JAIN; :  
:  
\$487,161.00 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 8617, HELD IN THE NAME OF KANTA :  
NATH JAIN; :  
:  
\$793,461.07 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 8616, HELD IN THE NAME OF HAINKE :  
& ANDERSON TRADING LLC; :  
:  
\$171,610.38 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 8567, HELD IN THE NAME OF HAINKE :  
& ANDERSON TRADING LLC; :  
:  
\$1,064,747.89 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 8572, HELD IN THE NAME OF JAYNA :  
TRADING CO.; :

\$128,341.00 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 8610, HELD IN THE NAME OF JAYNA :  
KUMAR JAIN; :  
:  
\$209,102.50 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 8611, HELD IN THE NAME OF JAYNA :  
TRADING CO.; :  
:  
\$13,415.18 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 8556, HELD IN THE NAME OF NITIN :  
JAIN; :  
:  
\$14,026.08 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 4225, HELD IN THE NAME OF NITIN :  
JAIN; :  
:  
\$2,748.00 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 8557, HELD IN THE NAME OF PANKAJ :  
JAIN; :  
:  
\$24,449.65 FORMERLY ON DEPOSIT AT :  
MAN FINANCIAL INC., IN ACCOUNT NUMBER :  
[REDACTED] 8558, HELD IN THE NAME OF PANKAJ :  
JAIN; :  
:  
Defendants-in-rem. :  
:  
- - - - - x

Upon the accompanying Default Judgment, and upon all prior proceedings herein, the plaintiff will move this Court before the Honorable Sidney H. Stein, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York 10007, on January 31, 2008, at 9:30 A.M., on submission, for an order pursuant to Rule 55 of the Federal Rules of Civil Procedure granting default judgment in favor of the plaintiff, United States of America, and forfeiting the defendants-in-rem to the United States of America and for such other relief as is just

and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 6.1 (b) of the Civil Rules of this Court, the claimant is required to serve answering affidavits and memoranda, if any, upon the individuals listed in Exhibit 1, within ten days after service of this motion.

Dated: New York, New York  
January 10, 2008

MICHAEL J. GARCIA  
United States Attorney for the  
Southern District of New York  
United States of America

By:                     /s/                      
CHRISTINE MEDING (CM-8556)  
Assistant United States Attorney  
One St. Andrews Plaza  
New York, New York 10007  
(212) 637-2614

**Exhibit 1**

**By International Express Mail**

Naresh Kumar Jain Patel  
Kumar Trading Co. LLC  
Suite 1105, Al Owais Tower  
PO Box 4107  
Dubai, UAE

Pankaj Jain  
Hainke & Anderson Trading LLC  
1105 Alowais Tower  
P.O. Box 64932  
Deira, Dubai UAE

Kanta Nath Jain  
Jayna Trading Co. LLC  
PO Box 40038  
Shop No. 4 Below Royal Park Hotel  
Deira, Dubai UAE

Nitin Jain  
PO Box 42243  
Dubai, UAE